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Attorney for Defendant  
BACKGROUNDCHECKS.COM LLC

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Kathleen Spain,

Case No. 2:22-cv-00778-CDS-VCF

**Plaintiff.**

V.

Equifax Information Services, LLC; Backgroundchecks.com LLC; Experian Information Solutions, Inc.; Bank of America, N.A.; Specialized Loan Servicing LLC; and Trans Union LLC.

## Defendants.

**STIPULATION TO EXTEND TIME TO  
SUBMIT A PROPOSED DISCOVERY PLAN  
AND SCHEDULING ORDER**

## [FIRST REQUEST]

Plaintiff KATHLEEN SPAIN (“Plaintiff”), Defendant BACKGROUNDCHECKS.COM LLC (“BGC”), and Defendant BANK OF AMERICA, N.A. (“BANA”), by and through their undersigned counsel, do hereby stipulate and agree as follows:

WHEREAS, on May 16, 2022, Plaintiff initiated this action against five defendants;

WHEREAS, as of the date of this stipulation, only Defendant Specialized Loan Servicing LLC has responded to the Complaint (**ECF No. 23**);

WHEREAS, Plaintiff has filed notices of settlement with Specialized Loan Servicing LLC (**ECF No. 38**) and Equifax Information Services LLC (**ECF No. 32**);

WHEREAS, Defendant Trans Union LLC has not appeared in the case;

WHEREAS, the deadline for BANA to respond to the Complaint is September 2, 2022 (**ECF**

1       **No. 37)** and the deadline for BGC to respond to the Complaint is September 9, 2022 (**ECF No. 35**);

2           WHEREAS, on August 16, 2022, the Court ordered the parties to submit a proposed discovery  
3 plan and scheduling order on or before August 30, 2022 (**ECF No. 43**);

4           IT IS HEREBY STIPULATED between the parties and respectfully requested that the Court  
5 extend the deadline to submit a discovery plan and scheduling order until two weeks after the first  
6 remaining defendant responds to the Complaint, but not later than October 3, 2022.

7           Dated: August 30, 2022

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10       /s/ Gerardo Avalos, Esq.

11       MICHAEL KIND, ESQ.  
KIND LAW

12       GEORGE HAINES, ESQ.  
GERARDO AVALOS, ESQ.  
FREEDOM LAW FIRM, LLC

13       *Attorneys for Plaintiff*  
KAHTLEEN SPAIN

14       /s/ Diana G. Dickinson, Esq.

15       DIANA G. DICKINSON, ESQ.  
LITTLER MENDELSON, P.C.

16       *Attorney for Defendant*  
BACKGROUNDCHECKS.COM LLC

17       /s/ Scott Lachman, Esq.

18       MELANIE D. MORGAN, ESQ.  
SCOTT R. LACHMAN, ESQ.  
AKERMAN LLP

19       *Attorney for Defendant*  
Bank of America, N.A.

20           **IT IS SO ORDERED.**

21           8-31-2022

22       Dated: \_\_\_\_\_

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29       UNITED STATES MAGISTRATE JUDGE